

September 19, 2012

Manucher Alemi, Ph. D., P.E.
Chief, Water Use Efficiency Branch
Division of Statewide Integrated Water Management
Department of Water Resources
901 P Street
Sacramento, CA 95814

RE: Draft Guidebook to Assist Agricultural Water Suppliers to Prepare a 2012 Agricultural Water Management Plan

Dear Manucher:

We appreciate the intent of the Department of Water Resources (DWR) in releasing the *Guidebook to Assist Agricultural Water Suppliers to Prepare a 2012 Agricultural Water Management Plan* (Guidebook) to provide water suppliers with information regarding the requirements that need to be met when preparing an Agricultural Water Management Plan (AWMP). But, we are concerned that the draft Guidebook does not adequately distinguish between components of an AWMP that are required to comply with the law versus those that are recommended by DWR.

Much of the guidebook contains recommendations for water suppliers which are not mandated by the legislation. With the limited amount of time available before the December 31st deadline (approximately 60 working days), the guidebook would have provided the greatest value by clearly and succinctly identifying the components AWMPs must contain to be in compliance with the requirements mandated by SB X7-7.

As currently written, the Guidebook will likely leave water suppliers and others with a false impression of what information will need to be provided in an AWMP. This could create additional problems when DWR submits its report to the Legislature in 2013 and there is not a clear understanding of the information “approved” plans contain.

It is our recommendation that DWR not rush to finalize the Guidebook as if doing so would have material effect on the 2012 AWMPs, most of which are already substantially complete and have been prepared in accordance with the law. The draft can still be used to provide guidance to water suppliers who have not already finalized their plans. By leaving the Guidebook as a draft, DWR will avoid the confusion of what is required in the 2012 AWMPs and allow sufficient time for a more thorough and robust discussion of how required and recommended actions should be distinguished in the guidebook.

The limited amount of time provided for comments (eight working days) does not allow for the level of review necessary to have this discussion on September 20th, and there will not be enough time to make any substantial changes to the document before the end of the year. There is enough time to develop an AWMP guidebook that will provide value to water suppliers in time

to assist with the AWMP updates in 2015. We hope to have the opportunity to help with this effort.

Sincerely,

Todd N. Manley

Northern California Water Association

Thaddeus L. Bettner, P.E.

Glenn-Colusa Irrigation District

Lewis Bair

Reclamation District 108

John B. Davids, P.E.

Oakdale Irrigation District

Debra C. Liebersbach, P.E.

Turlock Irrigation District

Sam Bologna

South San Joaquin Irrigation District

Walt Ward

Modesto Irrigation District

Ted Trimble

Western Canal Water District

Eugene Massa Jr.

Biggs-West Gridley Water District

Tim O'Halloran

Yolo County Flood Control and Water Conservation District